

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**NICK VINCENT FLOR,**

**Plaintiff,**

v.

**Cause No. 1:20-cv-00027-JAP-LF**

**THE BOARD OF REGENTS OF THE  
UNIVERSITY OF NEW MEXICO,  
STEPHEN BISHOP, LISA BRODY,  
KEVIN GICK, KARIN HIGH, ERIC LAU,  
individually and in their official capacities,  
and EVA CHAVEZ,**

**Defendants.**

**DEFENDANT BOARD OF REGENTS OF THE  
UNIVERSITY OF NEW MEXICO'S UNOPPOSED SECOND MOTION  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF NICK FLOR'S  
FIRST SET OF REQUESTS FOR PRODUCTION**

Defendant the Board of Regents of the University of New Mexico ("UNM"), by and through its attorneys, Conklin, Woodcock & Ziegler, P.C. (Alisa Wigley-DeLara), moves this Court for an Order for a second extension of time to serve responses to Plaintiff Nick Flor's First Set of Requests for Production served on July 15, 2020.

1. On July 15, 2020 Plaintiff's served their First Set of Requests for Production to Defendant University of New Mexico. *See* Certificate of Service (Doc. 59)<sup>1</sup>.
2. Responses to these discovery requests is currently due September 14, 2020.
3. Because the Plaintiff was permitted to file an amendment of his pleading in the Memorandum Opinion and Order granting Defendants' Motion to Dismiss (Doc. 64), Defendant

---

<sup>1</sup>The Certificate of Service indicates that Plaintiff served Interrogatories to Defendant. Counsel has confirmed that only Requests for Production were served on July 15, 2020.

sought and was granted an extension of time to serve its responses until September 14, 2020. *See* Order Granting Defendant's Motion for Extension of Time (Doc. 67).

4. Plaintiff since filed a Second Amended Complaint bringing claims against several new individually named Defendants. *See* Second Amended (Doc. 68).

5. Defendant's seek a second extension of time to respond to the Plaintiff's First Set of Requests for Production to October 14, 2020.

6. Plaintiff, through counsel Nicholas T. Hart, does not oppose this motion.

WHEREFORE, Defendant respectfully requests this Court to grant the Second Motion for Extension of time to Respond to Plaintiff Nick Flor's First Set of Requests for Production, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

CONKLIN, WOODCOCK & ZIEGLER, P.C.

By: /s/ Alisa Wigley-DeLara  
Alisa Wigley-DeLara  
320 Gold Ave., Suite 800  
Albuquerque NM 87102  
Telephone: (505) 224-9160  
*Attorney for Defendant*

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was e-filed and served via email upon counsel of record on this 11<sup>th</sup> day of September, 2020.

/s/ Alisa Wigley-DeLara  
Alisa Wigley-DeLara